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U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Street
Philadelphia, PA 19107

SUBJECT: NVF-Kennett Square, PA

DATE: 2/14/91

FROM: ^{WJW} Diane Wehner, ^{BD} Bob Davis and ^{RP} Ron Preston
Biological Technical Assistance Group (BTAG)

TO: Harry Daw, Project Manager (3HW33)
NVF-Kennett Square Site

This memo is to follow up on the BTAG's discussion of the appropriate clean up level for PCB contaminated sediments in an unnamed tributary to Red Clay Creek. We understand that a target clean up level of 10 ppm has already been achieved via removal activities already undertaken.

The BTAG was asked to address USFWS concerns to you regarding the inappropriateness of the 10 ppm clean up level. While the 10 ppm level may address possible human health concerns, the potential for risk to the environment still exists.

In August 1990, EPA published guidance on remedial actions for Superfund sites with PCB contamination. In this guidance, the recommended clean up level for PCB's in sediments ranges from .19 to 1.9 ppm depending upon the organic carbon content of the sediments. Additional information regarding these levels can be found on pages 34-38 of that document.

Based upon the information available to us at this time, we conclude that clean up to the 10 ppm level is not protective of the environment. However, a decision as to whether additional clean up activities should be completed and programmatically how that should be decided can be best addressed by the Division.

If you have any questions concerning these comments, please contact Diane Wehner (215/597-3636) or Bob Davis (215/597-6488).

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